

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KEITH STANSELL,
MARC GONSALVES,
THOMAS HOWES,
JUDITH G. JANIS,
CHRISTOPHER T. JANIS,
MICHAEL I. JANIS,
and JONATHAN N. JANIS

CASE NO.: 16-mc-405-P1

Plaintiffs,
vs.

REVOLUTIONARY ARMED FORCES OF COLOMBIA (FARC); et al.,

Defendants.

NOTICE OF FILING
PLAINTIFFS' APPENDIX IN SUPPORT OF POST-JUDGMENT EXECUTION
AGAINST AGENCIES OR INSTRUMENTALITIES OF THE FARC

**(Venezuela's "Cartel of the Suns' and the
"EL AISSAMI & LOPEZ BELLO NETWORK")**

Plaintiffs file the following materials in support of their post-judgment execution proceedings against blocked accounts and blocked assets of agencies or instrumentalities of the FARC under Section 201 of the Terrorism Risk Insurance Act of 2002:

1. 9/12/08 Treasury OFAC Press Release: "Treasury Targets Venezuelan Government Officials Supporting the FARC"
2. 9/8/11 Treasury OFAC Press Release: "Treasury Designated Four Venezuelan Officials for Providing Arms and Security to the FARC"
3. 5/29/12 Reuters: "Fugitive Venezuela judge helps elite U.S. anti-drugs unit"
4. 11/6/12: Testimony of Ambassador Roger F. Noriega Before the United States House Of Representatives Committee On Homeland Security, "A Line in the Sand: Assessing Dangerous Threats to Our Nation's Borders"

5. 8/21/13 Treasury OFAC Press Release: “Treasury Targets Venezuelan Narcotics Trafficker – Action Designates Former Venezuelan Military Official, Previously Indicted”
6. 1/21/15 Indictment (unsealed) USA v Nestor Luis Reverol Torres in EDNY Case No. 15-cr-00020 (former Director VZ National Anti-drug agency)
7. 1/27/15 Epoch Times: “Venezuela’s Assembly President is Head of Drug Cartel, Claims Ex-Security Chief”
8. 3/8/15 [IEEPA] Executive Order 13692 “Blocking Property and Suspending Entry of Certain Persons Contributing to the Situation in Venezuela
9. 4/24/15 Indictment (unsealed) USA v. Pedro Luis Martin Olivares, SDFL Case No. 15-cr-20299
10. 8/11/15 American Enterprise Institute: “Venezuela: Rise of a narcostate”
11. 12/15/15 New York Times: “Venezuelan Official Is Said to Be Charged in Drug Case in U.S. Court”
12. 12/16/15 American Enterprise Institute: “Fresh evidence of the Venezuelan narcostate”
13. Jan/Feb 2016 Military Review, Prof. Leopoldo E. Colmenares G.: “Criminal Networks in Venezuela, Their Impact on Hemispheric Security”
14. 2/18/16 Breitbart News: “Colombian Drug Lord: Venezuela's Former #2 Sold Cocaine”
15. 8/1/16 DOJ Press Release: “Former Top Leaders Of Venezuela’s Anti-Narcotics Agency Indicted For Trafficking Drugs To The United States”
16. 11/3/16 Sun Herald: “U.S. judge delivers new blow to Venezuelan ‘first nephews’ on eve of trial”
17. 11/9/16 Insight Crime: “Arrest of Third Suspect May be Gamechanger in Venezuela ‘Narco Nephews’ Case”
18. 12/16/16 Insight Crime: “FARC Expels 5 Commanders, Revealing Extent of Rebel Fragmentation”
19. 1/4/17 Insight Crime: “GameChangers 2016: Venezuela’s Cartel of the Suns Revealed”

20. 2/13/17 Treasury OFAC Press Release: “Treasury Sanctions Prominent Venezuelan Drug Trafficker Tareck El Aissami and his Primary Front Man Samark Lopez Bello”
21. 2/13/17 OFAC Chart of El Aissami and Lopez Bello network
22. June 2017 American Enterprise Institute: “Kingpins and Corruption, Targeting Transnational Organized Crime In The Americas”
23. 8/13/17 Miami Herald: “Powerful Venezuelan lawmaker may have issued death order against Rubio”
24. 8/16/17 Opinion & Order in Cabello-Rondon v Dow Jones & Co., SDNY Case No. 1:16-cv-03346-KBF dismissing defamation action arising from 5/18/15 WSJ article and finding that Cabello “failed to adequately plead material falsity”
25. 9/20/17 Treasury FINCEN “Advisory on Widespread Public Corruption in Venezuela”
26. 12/14/17 DOJ Press Release: “Nephews of Venezuela First Lady Each Sentenced to 18 Years in Prison for Conspiring to Import Cocaine into the United States”
27. 4/24/18 PanAmPost: “Testimony of Colombian Marlon Marin, nephew of “Ivan Marquez”, head of the Colombian FARC guerilla, reveals once again that Chavismo’s second most powerful man is “up to his neck” in the drug trade through the “Cartel de los Suns”
28. 4/25/18 Summary Order from 2nd Circuit Court of Appeals in Cabello-Rondon v. Dow Jones Case 17-2895 affirming dismissal of defamation lawsuit vs WSJ
29. 4/24/18 New York Law Journal: “Second Circuit Affirms Dismissal of Libel Suit by Top Venezuelan Politician Over WSJ Report”
30. May 2018 Insight Crime:” “Venezuela-A Mafia State? §2. Drug Trafficking within the Venezuelan Regime: The Cartel of the Suns”
31. 5/7/18 Treasury OFAC Press Release: “Treasury Sanctions Drug Trafficking and Money Laundering Network Led By Former Senior Venezuelan Intelligence Official”
32. 5/7/18 OFAC Chart on Pedro Luis Martin Olivares network
33. 5/17/18 Insight Crime: “Drug Trafficking Within the Venezuelan Regime: The ‘Cartel of the Suns’”

34. 5/18/18 Treasury OFAC Press Release: “Treasury Targets Influential Former Venezuelan Official and His Corruption Network”
35. 5/18/18 Treasury OFAC SDN List Update – Venezuela Designations
36. 6/2/18 Daily Beast: “How Cuba Helped Venezuela Become a Mafia State”
37. 9/25/18 Treasury OFAC: “Treasury Targets Venezuelan President Maduro’s Inner Circle and Proceeds of Corruption in the United States
38. Majority Report. U.S. House Committee on Homeland Security, Subcommittee on Oversight, Investigations, and Management. “A Line in the Sand: Countering Crime, Violence and Terror at the Southwest Border”, Appendix A, Congressional Delegation Findings (Nov. 2012).

Respectfully submitted January 14, 2019

/s/ Newton P. Porter
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 14, 2019, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I further certify that I served the foregoing document and the notice of electronic filing by first class mail and electronic mail to the following persons:

OFFICE OF FOREIGN ASSETS CONTROL

U.S. Department of the Treasury

1500 Pennsylvania Ave. NW

Washington DC

Via email to OFAC counsel in compliance with 31 CFR 501.605

None of the FARC defendants have appeared and defaults were properly entered against them all prior to entry of the Default Judgment. Accordingly, no further notice, service of pleadings, motions or writs is required to be served on the FARC or the individual FARC members identified in the ATA Judgment. Fed. R. Civ. P. 5(a)(2).

/s/ Tony Korvick

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